

**FILED**

UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

OCT - 8 2024

*KRS*  
MITCHELL R. ELFERS  
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**NICHOLAS REPICHOWSKI,**

Defendant.

)  
)  
) CRIMINAL NO. 24 CR 1405 MLG  
)

) Count 1: 18 U.S.C. § 2422(b): Coercion  
) and Enticement of a Minor;  
)

) Counts 2-3: 18 U.S.C. § 2423(b):  
) Interstate Travel with Intent to Engage in  
) a Sexual Act with a Minor.  
)

INDICTMENT

The Grand Jury charges:

Count 1

From on or about April 27, 2023, and continuing to on or about March 5, 2024, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendant, **NICHOLAS REPICHOWSKI**, using any facility of interstate and foreign commerce, knowingly persuaded, induced, enticed and coerced, and attempted to knowingly persuade, induce, entice, and coerce, any individual who had not attained the age of 18 years, to engage in any sexual activity for which any person could be charged with a criminal offense.

In violation of 18 U.S.C. § 2422(b).

Count 2

From on or about November 23, 2023, and continuing to on or about November 24, 2023, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendant, **NICHOLAS REPICHOWSKI**, traveled in interstate commerce from the District of New Mexico to the State of California, for the purpose of engaging in illicit sexual conduct, that is, a sexual act as that term is defined in 18 U.S.C. § 2246, with Jane Doe, a person under the age of 18, which

sexual act would constitute a violation of Title 18, United States Code, Chapter 109A if the sexual act occurred in the special maritime and territorial jurisdiction of the United States.

In violation of 18 U.S.C. § 2423(b).

Count 3

From on or about March 3, 2024, and continuing to on or about March 4, 2024, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendant, **NICHOLAS REPICHOWSKI**, traveled in interstate commerce from the District of New Mexico to the State of California, for the purpose of engaging in illicit sexual conduct, that is, a sexual act as that term is defined in 18 U.S.C. § 2246, with Jane Doe, a person under the age of 18, which sexual act would constitute a violation of Title 18, United States Code, Chapter 109A if the sexual act occurred in the special maritime and territorial jurisdiction of the United States.

In violation of 18 U.S.C. § 2423(b).

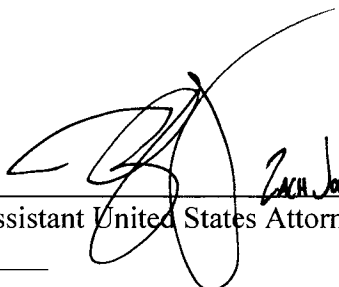
FORFEITURE ALLEGATION

Upon conviction of any offense in violation of 18 U.S.C. § 2422 or 18 U.S.C. § 2423, the defendant, **NICHOLAS REPICHOWSKI**, shall forfeit to the United States, pursuant to 18 U.S.C. § 2428: any property, real or personal, used or intended to be used to commit or to facilitate the commission of such violation; and any property, real or personal, constituting or derived from any proceeds the defendant obtained, directly or indirectly, as a result of such violation, including, but not limited to:

- a. a Samsung cellular phone bearing IMEI number 352149100434090;
- b. a Samsung cellular phone bearing IMEI number 354327826509845;
- c. a Google Pixel cellular phone bearing IMEI number 351545705057487;
- d. a silver colored ring with red and white stones in a heart-shaped box; and

e. clothing, to include: black stockings, a maid outfit, a harness, and white stockings.

A TRUE BILL:

  
\_\_\_\_\_  
Assistant United States Attorney

  
\_\_\_\_\_  
FOREPERSON OF THE GRAND JURY